

EXHIBIT 10

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 1:19-cv-08655 (LGS)(GWG)

**DEFENDANT GOOGLE LLC'S
OBJECTIONS AND SUPPLEMENTAL
RESPONSES TO PLAINTIFF'S SECOND
SET OF INTERROGATORIES**

PROPOUNDING PARTY: PLAINTIFF ULKU ROWE

RESPONDING PARTY: DEFENDANT GOOGLE LLC

SET NO.: TWO

OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 8:

Defendant objects to this Interrogatory on the grounds that it is vague and ambiguous as to “individuals involved,” and “initial hiring and leveling decisions.” Defendant further objects to this Interrogatory on the grounds that it is unduly burdensome and oppressive to the extent that it requires Defendant to identify any individual beyond relevant decision-makers. Defendant further objects to this Interrogatory to the extent that, through the incorporated Instructions, it seeks information protected by the attorney-client privilege and/or attorney work product doctrine. Defendant further objects to this Interrogatory to the extent that, through the incorporated Instructions, it seeks information pertaining to individuals, the disclosure of which would constitute an unwarranted invasion of the affected individuals’ constitutional, statutory and/or common law rights to personal privacy and confidentiality. Defendant further objects to this Interrogatory to the extent that it is duplicative of Plaintiff’s Interrogatory No. 2.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Interrogatory, Defendant responds as follows (responses reflect current or most recent titles):

- **Eric Brewer**, VP Infrastructure, Google Fellow, onsite interviewer (may be contacted through counsel)
- **Jason Martin**, VP, Professional Services, onsite interviewer (may be contacted through counsel)
- **Dave Rensin**, Sr. Director of Engineering, Office of the CFO, onsite interviewer (may be contacted through counsel)
- **Solomon Boulos**, Software Engineer, onsite interviewer (may be contacted through counsel)

- **Will Grannis**, Director, CTO Office, Hiring manager and phone interviewer, consulted in negotiation of Plaintiff's offer (may be contacted through counsel)
- **Ken Cox**, Staffing Manager - Engineering Management, approved offer packet to move forward for final review (may be contacted through counsel)
- **Jenny (Burdis) Anderton**, Staffing Lead, Google Cloud, submitted Offer Packet for final review (may be contacted through counsel)
- **Krista Callaghan**, Head of Operations, Leadership Staffing, managed initial outreach to Plaintiff and early stages of hiring process (may be contacted through counsel)
- **Chris Humez**, Compensation Business Partner, structured Plaintiff's compensation and handled requests for adjustments due to negotiations (may be contacted through counsel)
- **Gary James**, Manager, Candidate Evaluation Strategy and Operations, submitted final offer packet to reviewers (may be contacted through counsel)
- **Urs Hoelzle**, SVP Technical Infrastructure, reviewed and approved final offer packet (may be contacted through counsel)
- **Sridhar Ramaswamy**, Former SVP, GPI & Ads, reviewed and approved final offer packet ([REDACTED])
- **Melissa Lawrence**, Director, People Operations, consulted in negotiation of Plaintiff's offer (may be contacted through counsel)

- **Brian Stevens**, former CTO of Google Cloud, phone interviewer and consulted in negotiation of Plaintiff's offer ([REDACTED])

INTERROGATORY NO. 9:

Identify all individuals involved in the initial hiring and leveling decisions related to the following individuals:

- (a) Jonathan Donaldson;
- (b) Evren Eryurek;
- (c) Nicholas Harteau;
- (d) Benjamin Wilson;
- (e) Stuart Breslow

OBJECTIONS AND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 9:

Defendant objects to this Interrogatory on the grounds that it is vague and ambiguous as to "individuals involved," and "initial hiring and leveling decisions." Defendant further objects to this Interrogatory on the grounds that it is unduly burdensome and oppressive to the extent that it requires Defendant to identify any individual beyond relevant decision-makers. Defendant further objects to this Interrogatory to the extent the individuals listed in subparts (a) through (e) are not appropriate comparators for purposes of Plaintiff's Equal Pay claims, and therefore seeks information not relevant to either party's claims or defenses, not proportional to the needs of the case, and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this Interrogatory to the extent that, through the incorporated Instructions, it seeks information protected by the attorney-client privilege and/or attorney work product

doctrine. Defendant further objects to this Interrogatory to the extent that, through the incorporated Instructions, it seeks information pertaining to individuals, the disclosure of which would constitute an unwarranted invasion of the affected individuals' constitutional, statutory and/or common law rights to personal privacy and confidentiality.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Interrogatory, Defendant responds as follows (responses reflect current or most recent titles):

(a) Jonathan Donaldson

- **Brian Stevens**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Solomon Boulos**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Will Grannis**, onsite interviewer, phone interviewer, and hiring manager (for additional details, see response to Interrogatory No. 8)
- **Eric Brewer**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Jason Martin**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Dave Rensin**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Ken Cox**, approved offer packet to move forward for final review (for additional details, see response to Interrogatory No. 8)

- **Jenny (Burdis) Anderton**, submitted offer packet for final review (for additional details, see response to Interrogatory No. 8)
- **Chris Humez**, structured compensation and handled requests for adjustments due to negotiations (for additional details, see response to Interrogatory No. 8)
- **Gary James**, submitted final offer packet to reviewers (for additional details, see response to Interrogatory No. 8)
- **Urs Hoelzle**, reviewed and approved final offer packet (for additional details, see response to Interrogatory No. 8)
- **Sridhar Ramaswamy**, reviewed and approved final offer packet (for additional details, see response to Interrogatory No. 8)

(b) Evren Eryurek;

- **Eric Brewer**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Solomon Boulos**, onsite interviewer, phone interviewer (for additional details, see response to Interrogatory No. 8)
- **Dave Rensin**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Brian Stevens**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Jason Martin**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Sam Schillace**, VP Engineering, onsite interviewer (may be contacted through counsel)

- **Will Grannis**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Dave Beuerlein**, Former Director, Leadership Staffing, approved offer packet to move forward for final review ([REDACTED])
- **Teresa Tan-Vial**, Former Senior Executive Recruiter, submitted offer packet for final review ([REDACTED])
- **Chris Humez**, structured compensation and handled requests for adjustments due to negotiations (for additional details, see response to Interrogatory No. 8)
- **Urs Hoelzle**, reviewed and approved final offer packet (for additional details, see response to Interrogatory No. 8)
- **Sridhar Ramaswamy**, reviewed and approved final offer packet (for additional details, see response to Interrogatory No. 8)
- **Gary James**, submitted final offer packet to reviewers (for additional details, see response to Interrogatory No. 8)

(c) Nicholas Harteau;

- **Jason Martin**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Will Grannis**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Eric Brewer**, onsite interviewer (for additional details, see response to Interrogatory No. 8)

- **Dave Rensin**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Solomon Boulos**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Ken Cox**, approved offer packet to move forward for final review (for additional details, see response to Interrogatory No. 8)
- **Jenny (Burdis) Anderton**, submitted offer packet for final review (for additional details, see response to Interrogatory No. 8)
- **Chris Humez**, structured compensation and handled requests for adjustments due to negotiations (for additional details, see response to Interrogatory No. 8)
- **Brian Stevens**, approved decision to hire Mr. Harteau from customer company (for additional details, see response to Interrogatory No. 8)
- **Diane Greene**, Google Friend, approved decision to hire Mr. Harteau from customer company ([REDACTED])
- **Urs Hoelzle**, reviewed and approved final offer packet (for additional details, see response to Interrogatory No. 8)
- **Jen Fitzpatrick**, SVP, Core Systems & Experiences, reviewed and approved final offer packet (may be contacted through counsel)
- **Gary James**, submitted final offer packet to reviewers (for additional details, see response to Interrogatory No. 8)

(d) Benjamin Wilson;

- **Solomon Boulos**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Eric Brewer**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Brian Stevens**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Dave Rensin**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Jason Martin**, conducted informal interview over lunch (for additional details, see response to Interrogatory No. 8)
- **Will Grannis**, phone interviewer and hiring manager (for additional details, see response to Interrogatory No. 8)
- **Ken Cox**, approved offer packet to move forward for final review (for additional details, see response to Interrogatory No. 8)
- **Jenny (Burdie) Anderton**, submitted offer packet for final review (for additional details, see response to Interrogatory No. 8)
- **Krista Callaghan**, managed initial outreach to Plaintiff and early stages of hiring process (phone interview only) (for additional details, see response to Interrogatory No. 8)
- **Gaurav Munjal**, Leadership Recruiter, managed initial outreach to Plaintiff and early stages of hiring process (phone interview only) (may be contacted through counsel)

- **Chris Humez**, structured compensation and handled requests for adjustments due to negotiations (for additional details, see response to Interrogatory No. 8)
- **Gary James**, submitted final offer packet to reviewers (for additional details, see response to Interrogatory No. 8)
- **Sofya Muftishvili**, Strategy and Operations Program Manager, submitted final offer packet to reviewers (may be contacted through counsel)
- **Urs Hoelzle**, reviewed and approved final offer packet (for additional details, see response to Interrogatory No. 8)
- **Jen Fitzpatrick**, reviewed and approved final offer packet (may be contacted through counsel) (for additional details, see response to Interrogatory No. 9(c))

(e) Stuart Breslow

- **Brian Stevens**, onsite interviewer (for additional details, see response to Interrogatory No. 8)
- **Tariq Shaukat**, Former President, Industry Products and Solutions, Google Cloud, onsite interviewer (may be contacted through counsel)
- **Greg Moore**, VP, Google Cloud Healthcare & Life Sciences, onsite interviewer ([REDACTED])
- **Fiona O'Donnell**, Director of People Operations, Cloud HR, onsite interviewer (may be contacted through counsel)
- **Spencer Stuart**, executive search firm, sourced candidate
- **Stuart Vardaman**, Recruiter, Leadership Talent, lead recruiter (may be contacted through counsel)

VERIFICATION

The undersigned, Gary James, hereby attests that he is an agent of Defendant Google and he has reviewed the facts set forth in the responses to Interrogatory Nos. 8 and 9 of **DEFENDANT GOOGLE LLC'S OBJECTIONS AND SUPPLEMENTAL RESPONSES TO PLAINTIFF'S SECOND SET OF INTERROGATORIES**. The undersigned declares under penalty of perjury that these facts are true and correct, upon information and belief.

Executed this ³_____ day of November, 2020 in Oakland, CA

DocuSigned by:

Gary James

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2020, I served a true and correct copy of the foregoing **DEFENDANT GOOGLE LLC'S OBJECTIONS AND SUPPLEMENTAL RESPONSES TO PLAINTIFF'S SECOND SET OF INTERROGATORIES** to Plaintiff

Ulku Rowe upon the following Counsel of Record for Plaintiff:

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